Amendments to the Drawings:

The attached replacement drawing sheet makes changes to Fig. 14 and replaces the original sheet with Fig. 14.

Attachment: Replacement Sheet (1)

REMARKS

Claims 1-16 are pending in this application. By this Amendment, the drawings are amended and claim 16 is added. The amendments introduce no new matter. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

Applicant appreciates the courtesies shown to Applicant's representative by Examiners Poon and Vo during the December 4, 2007 personal interview. Applicant's separate record of a summary of the substance of the personal interview is contained in the following remarks.

The Office Action, on page 2, rejects claims 1-15 under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the enablement requirement. The Office Action, on page 3, rejects claims 1-15 under 35 U.S.C. §112, second paragraph, as being indefinite. With respect to independent claims 1 and 13, the Office Action asserts that it is unclear how it is possible to have a vector A parallel to another vector B and have a vector A not parallel to vector B, simultaneously.

Claims 1 and 13 recite, among other features, a first-color halftone screen and a second-color halftone screen in said screen set satisfy a relationship that first vectors, each being either one of two screen vectors in a spatial frequency domain defined by basis vectors in two directions of a halftone dot pattern in the first-color or second-color halftone screen, are parallel to each other, and second vectors, each being the other one of the two screen vectors, are not parallel to each other. In asserting the above features to be confusing and/or not enabled, the Office Action misconstrues the plain language of the claim and further misconstrues the claim language in light of the specification.

As presented at the December 4 personal interview, the plain meaning of the above-quoted features is a first-color halftone screen (see, *e.g.*, Fig. 14(a)) and a second-color halftone screen (see, *e.g.*, Fig. 14(b)) in said screen set satisfy a relationship that first vectors,

e.g., Wa2 and Wb2, each being either one of two screen vectors in a spatial frequency domain defined by basis vectors in two directions of a halftone dot pattern in the first-color or second-color halftone screen, are parallel to each other, and second vectors, *e.g.* Wa1 and Wb1, each being the other one of the two screen vectors, are not parallel to each other.

Support for this interpretation is clearly found in Fig. 14 and pages 12 and 13 of Applicant's specification. With reference to Figs. 14(a) and (b), two half tone screens, *e.g.*, 200a and 200b, are depicted with parallel screen vectors, *e.g.*, Wa2 and Wb2. Further, Applicant's specification clearly discusses that screen vectors Wa1 and Wb1 are not parallel, in accordance with the features recited in claims 1 and 13. Figs. 14(a) and (b) are amended to clarify the relationships of the screen vectors as described in the specification.

Regarding the rejection under 35 U.S.C. §112, first paragraph, the test for compliance with this section, as stated in MPEP §2164.01, quoting *United States v. Telectronics, Inc.*, 857 F.2d 778, 785, 8 USPQ2d 1217, 1223 (Fed. Cir. 1988), is "whether one reasonably skilled in the art could make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation" (emphasis added). This standard is clearly met with regard to the above features.

Regarding the rejection under 35 U.S.C. §112, second paragraph, the test for compliance with this section, as stated in *Miles Lab., Inc. v. Shandon Inc.*, 997 F.2d 870, 875, 27 USPQ2d 1123, 1126 (Fed. Cir. 1993), *cert. denied*, 510 U.S. 1100 (1994) is whether one skilled in the art would understand the bounds of the claims when read in light of the specification. If the claims, read in light of the specification, reasonably apprise those skilled in the art of the scope of the invention, Section 112 demands no more. *See, also, In re Merat*, 519 F.2d 1390, 1396, 186 USPQ 471, 476 (CCPA 1975), which stated that the question under Section 112, second paragraph, is whether the claim language, when read by a person of ordinary skill in the art in light of the specification, describes the subject matter with

sufficient precision that the bounds of the claimed subject matter are distinct. *See, also, In re Warmerdam*, 33 F3d 1354, 1361, 31 USPQ2d 1754, 1759 (Fed. Cir. 1994). This standard is met with respect to the above-described features.

Without conceding the propriety of these rejections, the drawings are amended to clarify the relationship of features recited in claims 1 and 13 and described on pages 12 and 13 of Applicant's disclosure as filed. During the December 4 personal interview, Applicant's representative presented the Examiners with proposed amended Figs. 14(a) and (b). Applicant's representative asserted that at least Figs. 14(a) and (b) adequately clarify any alleged ambiguity regarding features recited in claims 1 and 13. The Examiners indicated they would take these amendments and arguments into further consideration upon submission of a formal response.

For at least the foregoing reasons, the claims are adequately clear and definite, and enabled.

Accordingly, reconsideration and withdrawal of the rejections of claims 1-15 under 35 U.S.C. §112, first and second paragraphs, are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-16 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned representative at the telephone number set forth below.

Respectfully submitted,

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JAO:CJW/clf

Attachments:
Replacement Drawing Sheets (1)

Date: December 11, 2007

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